

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE

ORLY GENGER

Debtor.

Case No. 19-13895-JLG

DECLARATION OF JARED C. BORRIELLO, ESQ.

Jared C. Borriello, pursuant to 28 U.S.C. § 1746(2), declares as follows:

1. I am duly admitted to practice law in this State and before this Court. My firm represents Arie Genger, a creditor in the above-referenced bankruptcy case.
2. I respectfully submit this declaration in support of the common interest privilege and joint defense privilege shared by and among the debtor, Orly Genger, her father, Arie Genger, her husband, Eric Herschmann, his employer, Kasowitz Benson Torres LLP, David Broser, Arnold Broser, and their respective affiliated entities, as applicable, and legal counsel (collectively, the “Common Interest Parties”). Certain communications between or among the Common Interest Parties are privileged and such privilege was not waived because the communications concern matters of common legal interests and/or joint defense strategy.
3. I hereby attest that my and my firm’s relevant communications with other Common Interest Parties were confidential, were made pursuant to an express understanding that they would remain so, and were in furtherance of the parties’ shared common legal interests and/or joint defense strategy.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: July 14, 2020

s/ Jared C. Borriello

Jared C. Borriello